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Dear Ms. Miller,

Below are the responses to four requests for additional information we received from you dated November 7th, November 9th (2 reports), and November 20th.

November 7th (Amended April Monthly Report Period: 3/1 - 3/31)

Your Amended 2012 March Monthly (2/1/12-2/28/12), received 7/23/12 and Amended 2012 April Monthly (3/1/12-3/31/12), received 7/23/12 Reports disclose a substantial decrease in certain categories of of disbursements from the amounts disclosed on your original reports (see attached). Please amend your report or provide an explanation to clarify why this additional activity was not provided with your original reports. (11 CFR ? 104.3)

- The Committee accurately reported all public communications that contained express advocacy and resulted in independent expenditures on its 48- and 24-hour reports and on its Schedule Es. Some expenditures were for IEs that would be made in the future, but prior to public dissemination those expenditures were reported on a previous month's Schedule B. This is what happened with the Schedule B expenditures addressed in the RFAI. The Committee included those expenditures in future IE reporting when the expenditures resulted in public dissemination of public communications, but the Committee did not make negative entries on subsequent month Schedule Bs. The Committee has filed amended reports reflecting the appropriate negative entries on subsequent month Schedule Bs and shifting the expenditures on subsequent reports from Line 21 to 24. Also, as requested by RAD, the descriptions for previous month Schedule B entries have been amended to state 'Prepaid Independent Expenditure.' These descriptions are possible only in retrospect, because we now know that the expenditures actually became part of subsequent IEs.

November 9th (Amended May Monthly Report Period: 4/1 - 4/30)

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Field work." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i)

- This item has been elaborated upon in the description line and the report has been amended to reflect the additional description.

Schedule B of your report discloses an expenditure(s) for "Printing," "Production expense," "Media relations," and "Mail design." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR ?100.26) containing express advocacy as defined under 11 CFR ?100.22, this would constitute an independent expenditure and would be disclosed on a

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Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

- None of these items were direct express advocacy expenses not reported as independent expenditures already. These specific items were not public communications referring to a clearly defined federal candidate. There was absolutely NOT any work done on behalf of the candidate.

November 9th (Amended June Monthly Report: 5/1 - 5/31)

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Consulting." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

- This item has been elaborated upon in the description line and the report has been amended to reflect the additional description.

2. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR ?104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR ?104.3(b))

- This was a clerical error, as the date of 5/23 was incorrectly entered. This independent expenditure has been amended to reflect the appropriate date, as the date in which it was submitted - 5/29.

Schedule B of your report discloses an expenditure(s) for "Production and development costs," and "Media relations." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR ?100.26) containing express advocacy as defined under 11 CFR ?100.22, this would

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constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

- None of these items were direct express advocacy expenses not reported as independent expenditures already. These specific items were not public communications referring to a clearly defined federal candidate. There was absolutely NOT any work done on behalf of the candidate.

November 20th (Amended July Monthly Report: 6/1 - 6/30)

1. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Consulting fees." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

- This item has been elaborated upon in the description line and the report has been amended to reflect the additional description.

2. Schedule B supporting Line 21(b) of your report discloses reimbursements to individuals for expenses other than travel and subsistence. Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR ?? 104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20)

- A memo entry was filed along with the report, describing the transaction line by line reflecting the total of the office expense reimbursement on 21b.

3. Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the staff advance payment to the vendor must also be itemized in a memo entry

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for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR ? 104.9)

- A memo entry was filed along with the report, describing the transaction line by line reflecting the total of the office expense reimbursement on 21b.

On Schedule E supporting Line 24 of the Detailed Summary Page, your committee discloses a disbursement for "Direct mail piece" and lists itself (CAMPAIGN FOR PRIMARY ACCOUNTABILITY INC) as the payee. Please clarify the nature of this transaction or amend Schedule E by providing the correct name and mailing address of the payee.

- This direct mail piece was managed and organized in-house, however the vendor has been amended to reflect where the funds went more directly, as well as a memo entry included to cover the details behind the committee's expenditure on this mail piece.

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